



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

September 1, 1994

Ron Micheli, Treasurer
Wyoming Republican State Committee
P.O. Box 241
Casper, WY 82602

Identification Number: C00005785

Reference: Mid-Year (1/1/93-6/30/93) and Year End (7/1/93-12/31/93) Reports

Dear Mr. Micheli:

This letter is to inform you that as of August 31, 1994, the Commission has not received your response to our requests for additional information, dated August 10, 1994. These notices request information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to these requests (copies enclosed).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Stephen Cohen on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosures

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Ron Micheli, Treasurer
Wyoming Republican State Committee
P.O. Box 241
Casper, WY 82602

AUG 10 1993

Identification Number: C00005785

Reference: Mid-Year Report (1/1/93-6/30/93)

Dear Mr. Micheli:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-On Schedule H3 supporting Line 18 of the Detailed Summary Page, you have failed to provide a breakdown of transfers received. Please amend your report to include the missing information.

-Your report does not include a Schedule H1 to disclose the ratio for the allocation of administrative and generic voter drive costs. This ratio is determined at the beginning of each two-year election cycle. All shared administrative and generic voter drive costs incurred during the two-year cycle must be allocated according to this ratio, unless the federal account elects to pay a higher percentage of its cost. 11 CFR §106.5(b)(2), (d)(1), (d)(2) and 11 CFR §§104.10(b)(1)(ii)(B) and 106.6(c)

-Schedule H4 discloses a disbursement(s) which is categorized as a fundraising expense(s); however, a Schedule H2 has not been filed to disclose the allocation ratio. All committees are required to allocate the direct costs of each fundraising event in which the committee collects both federal and non-federal funds. The costs are allocated according to the funds received ratio and reported on Schedule H2. 11 CFR §§106.5(f) and 106.6(d). Please file a Schedule H2 to disclose the ratio for the fundraising event(s).

-The identification of each contributor, including the person's occupation and name of employer, must be provided if the person has contributed in excess of \$200

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in the aggregate during the calendar year. Please amend Schedule A supporting Line 11(a)(1) for each entry lacking a contributor's occupation and name of employer.

Note: If your committee has made attempts, either by a written request or by an oral request documented in writing to obtain this information from each contributor, your committee may have exercised "best efforts." Under revised 11 CFR 104.7(b), such effort shall consist of an initial clear and conspicuous request for the name, mailing address, occupation, and name of employer of each individual who has contributed over \$200 in the calendar year which informs the contributor that the reporting of such information is required by law. If necessary, your committee must make a written follow-up request or an oral follow-up request documented in writing, within thirty days with no additional solicitation. Subsequently, the committee should report any changes provided by the contributor or any additional information which is in the committee's records. If you believe that your committee satisfies the "best efforts" provision, you should provide a copy of your solicitation or an explanation of the method(s) used to obtain contribution information. Clarification regarding "best efforts" should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. 11 CFR §104.3(a)(4)(i)

-Line 18 of the Detailed Summary Page of your report discloses a total of \$28,322.86 in transfers from your non-federal account for joint activity. The sum of the entries itemized on Schedule H3, however, indicates the total to be \$23,393.95. Please amend your report to clarify the discrepancy.

-Your calculations for administrative/voter drive EVENT YEAR-TO-DATE totals are incorrect. EVENT YEAR-TO-DATE totals for administrative and voter drive costs are derived by aggregating all disbursements during the calendar year within the category. EVENT YEAR-TO-DATE totals for fundraising, direct candidate support, and exempt activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous EVENT YEAR-TO-DATE total for that category or event. This running EVENT YEAR-TO-DATE total should be disclosed after each disbursement is listed. Please amend your report by providing the correct administrative/voter drive EVENT YEAR-TO-DATE totals.

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-Your report disclosed certain categories of financial activity that have been reflected on the wrong lines of the Detailed Summary Page. Interest payments on loans should be properly disclosed on a separate Schedule B, supporting Line 21 of the Detailed Summary Page. In addition, voided checks should be disclosed on a separate Schedule B, as a negative disbursement, supporting the line on which the initial transaction occurred. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

-Your report includes computer produced formats of Schedules B and H4. Computer produced formats may only be used upon prior approval of the Commission. You should submit a separate sample format with a cover letter requesting approval. Until your format has been approved, FEC forms must be used. 11 CFR §104.2(d)

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedules B and H4 of your report to clarify the following descriptions: miscellaneous, College Republicans, National Committee, State Chairman, state sponsored events, bldg. political structure. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Please amend your report by providing the full address for each disbursement itemized on Schedules H4 and B supporting Lines 21(a) and 21(b).

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3585.

Sincerely,



Robyn Jimason
Reports Analyst
Reports Analysis Division

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